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May 15, 2020

APPLICATION GRANTED.

Defendant may file the listed submissions in redacted form. Defendant shall ensure that Plaintiffs can access unredacted versions of these submissions on the docket.

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Dated: May 18, 2020
New York, New York

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: *Medidata Solutions, Inc., et al. v. Veeva Systems, Inc.*, Case No. 1:17-cv-00589

Dear Judge Schofield:

Pursuant to Your Honor's Individual Rule I.D.3, Defendant Veeva Systems, Inc. ("Veeva") moves for leave of Court to file a redacted version of Veeva's motion for summary judgment and opposition to Plaintiffs Medidata Solutions, Inc.'s and MDSOL Europe Limited's (collectively, "Medidata") motion for summary judgment, and to file under seal certain related supporting documents. All of the material sought to be redacted or filed under seal consists of or relates to information that Medidata has designated "Highly Confidential" under the terms of the Protective Order in this case. ECF 119. Veeva does not seek confidential treatment for this material.

Due to the breadth of Medidata's confidentiality designations, Veeva is not always able to determine the exact boundaries of what Medidata believes requires confidential treatment. Veeva has thus erred on the side of over-inclusiveness.

Because Medidata is the only "party with an interest in confidential treatment" of this information, Medidata bears the burden of persuasion to seal it. Individual Rule I.D.3. Veeva does not concede that any of this information is in fact confidential or sealable.

Specifically, Veeva requests leave to file in redacted form or under seal the following materials:

- Defendant Veeva Systems, Inc.'s Motion for Summary Judgment and Opposition to Medidata's Motion for Summary Judgment (redacted)

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- Defendant Veeva Systems, Inc.'s Rule 56.1 Statement in Support of its Motion for Summary Judgment (under seal)
- Defendant Veeva Systems, Inc.'s Opposition to Plaintiffs' Rule 56.1 Statement of Undisputed Material Facts in Support of Defendant Veeva's Systems, Inc.'s Opposition to Plaintiffs' Motion for Summary Judgment (under seal)
- Declaration of Khari J. Tillery (under seal)
- Exhibits 1-7, 9, 11-13, 15-18, 20, 22-27, 31, and 33-34 to the Declaration of Khari J. Tillery (under seal)

Respectfully submitted,

KEKER, VAN NEST & PETERS LLP

A handwritten signature in black ink, appearing to read "K Tillery", with a stylized flourish at the end.

Khari J. Tillery

KJT:jr

cc: All counsel of record

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**Appendix of Appendix of Parties and Attorneys of Record in Accordance with
Individual Rule I.D.3**

Medidata Solutions, Inc. and MDSOL Europe Limited	Veeva Systems, Inc.
Patrick Arnett	Christa Anderson
David Nelson Draper	Kevin Joseph Bruno
Jordan Mitchell Heinz	Elizabeth Egan
Joseph Allen Loy	Andrew T. Hambelton
Claudia Elizabeth Ray	Reid P. Mullen
Yosef J. Riemer	Divya Musinipally
Benjamin A. Yaghoubian	Jay Rapaport
	Benjamin David Rothstein
	Khari J. Tillery
	Molly Caldwell Villagra